

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF OKLAHOMA

IN RE:

GREEN COPPER HOLDINGS, LLC)
EIN # xx-xxx9708)

CASE NO. 25-10088-T
Chapter 7

COPPER TREE, INC.)
EIN # xx-xxx6608)

Substantively Consolidated

THE INN AT PRICE TOWER INC.)
Debtors.)
/

**DECLARATION OF KENNITH GREENBERG IN SUPPORT
OF CLAIMS FOR PICTORIA STUDIOS AND TAKTIK ENTERPRISES
And IN OPPOSITION TO CLAIMS ASSERTED BY CYNTHIA BLANCHARD**

COMES NOW Kenneth Greenberg, who deposes and declares under penalties of perjury the following Declaration in support of Claims for Pictoria Studios USA, Inc., (Claimant No. 14), and Taktik Enterprises, Inc., (Claimant No. 4), and says:

1. My name is Kenneth Greenberg. I am over the age of 18 and competent to make this affidavit. I have personal knowledge of the facts stated herein.
2. My business address is: 1635 White Dove Drive, Winter Springs, FL 32708
3. I have extensive experience in banking and hospitality. I served as Vice President at IndyMac Bank (2006-2007), President of US Hospitality Group, LLC, and Senior Advisor to the Chairman at Westgate Resorts/Central Florida Investments, Inc. (2007-2008) and a licensed Real Estate Broker (1988 - present) . I currently work as a consultant and broker in real estate and financing through entities like GreenGold Consulting Corp and Dream It Realty, Inc.

4. I have previously worked with the team at Pictoria Studios USA, including Michael Moran, and Dale Takio of Taktik Enterprises, on startup and development projects. Michael Moran is one of the best startup marketing professionals I have ever worked with. His "Swiss Army knife" array of skills—including knowledge of business planning, technology, IT, marketing, digital marketing, and extensive experience—make him one of the top key people for startup projects in the country.

5. I was introduced to the Price Tower project in Bartlesville, Oklahoma, in June 2023. I officially signed a letter of understanding as a broker to help solicit loans and other financial vehicles for the project owned by Copper Tree Inc. and Green Copper Holdings LLC. This project was the Price Tower ("Project").

6. Until Moran and Takio were discharged from their contracts with the Debtors, I worked closely with Michael Moran and Dale Takio on an almost daily basis for the Project. This included acquiring due diligence documents, preparing presentation decks, and engaging potential financing partners for the Price Tower renovations and operations.

7. After the end of Moran and Takio's contracts with Copper Tree on or around October 2023, I continued to work directly with Copper Tree and Mrs. Cynthia Blanchard. In addition to securing financing for the real estate, part of my job was assisting Cynthia Blanchard with liquidating certain assets, such as artwork, updating appraisals, and identifying buyers for certain assets.

8. I witnessed throughout my services with Copper Tree, Mrs. Blanchard attempting to or actually moving out artifacts and artwork belonging to the Project for what I was told was to obtain "money to pay the bills". While I don't recall specifics, I know that Cynthia Blanchard sold off several art pieces belonging to the project.

9. I had video phone calls with Mrs. Blanchard while she was at her home in Bartlesville, Oklahoma and was personally in the Blanchard home in October 2023. She walked around her house showing me selected pieces of artwork and cabinets that her and her husband had taken from the Price Tower and decorated her home with.

10. Through my work efforts with Mrs. Blanchard, Donna Keffer and Deshane Atkins, I learned that Cynthia Blanchard had at least one warehouse, probably more, where she told me she was storing prized Frank Lloyd Wright pieces, artwork, and furniture that she had moved out of the Price Tower building before and during the long, holiday period at the end of 2023 and into January 2024.

11. Probably in October, November or December 2023, Mrs. Blanchard also discussed with me the possible sale of the Robert Indiana 66 sign in Union Park and that she was in possession of the proceeding or earlier renders of that sign which were moved from the Price Tower to her home and then to her warehouse.

12. At times, Mrs. Blanchard told me that the Project and herself were needing money, so she asked me on several instances to broker as much of the Project's artifacts and artwork that I could and she would pay me a commission for anything sold.

13. I introduced Mrs. Cynthia Blanchard to multiple people who were interested in purchasing the Project's art and artifacts, however, when I inquired whether anything was sold, she would not say and simply ignored the question.

14. I spoke to Patrick Castagana on many occasions from the summer of 2023 into 2024. Our conversations focused on the artwork as he was charged with figuring out what the Price Tower collection actually possessed, catalog it, price it out and if possible, sell it off. Patrick told me that while Cynthia Blanchard had a lot of collectables and artwork, she was extremely self-anxious

about people being able to actually see it, touch it, and authenticate it. He also told me that she always had excuses for not allowing him to really place it on the open market, but if she liked someone and felt comfortable with that person, she would do a quiet sale.

15. I was personally aware of, and involved with potential real estate capital raises including a \$5,000,000 loan to Copper Tree, Inc, Green Copper Holdings, LLC, and Cynthia Blanchard. I know that closing did not take place because just prior to closing, the private lender was having problems with Cynthia's lack of transparency and story changes.

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

Executed on September 8, 2025.


Ken Greenberg
Ken Greenberg (Sep 8, 2025 16:53:13 EDT)
KENNETH GREENBERG

Dated: September 8, 2025

Respectfully Submitted by:

/s/ Craig Alan Brand, Esq.

Craig Alan Brand, Esq.
Florida Bar No. (FBN): 896111
The Brand Law Firm, P.A.
6462 S. Jamaica Circle
Englewood, Colorado 80111
Tel. (305) 878-1477
Craig@thebrandlawfirm.com

Attorney for: TAKTIK ENTERPRISES, INC., AND, PICTORIA STUDIOS USA, INC.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on September 8, 2025, a true and correct copy of the foregoing Affidavit or Kenneth Greenberg was served electronically on participants in the CM/ECF system according to local procedures.

/s/ Craig Alan Brand, Esq.

Craig Alan Brand, Esq.

Florida Bar No. (FBN): 896111






greenberg affidavit

Final Audit Report

2025-09-08

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By:	Michael Moran (rainturtle@msn.com)
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